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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

KEVIN BROWN, an individual; JENNIFER  
BROWN, an individual;

Plaintiffs,

v.

SAM'S WEST, INC.; ADVANTAGE  
SALES AND MARKETING, LLC and  
DOES 1 through 100;

Defendants.

Case No. 2:15-cv-01964-LDG-CWH

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME FOR  
PARTIES TO FILE JOINT  
PRE-TRIAL ORDER**

**(Second Request)**

Pursuant to Local Rules 6-1 and 26-4, the parties, by and through their respective attorneys of record, stipulate and agree to continue the deadline for the parties to file their Joint Pre-Trial Order an additional forty-five (45) days.

This Court previously granted an extension for the parties to complete the Joint Pre-Trial Order, which is currently due on June 19, 2018, pursuant to the Stipulation and Order signed by the Court on April 12, 2018. [ECF No. 98]. The most recent stipulation was sought by the parties in order to allow for substantive settlement negotiations to proceed in an effort to resolve this matter. The parties have made significant progress, however, additional time is necessary to allow

1 Plaintiff to continue efforts to obtain updated medical records and bills from his medical  
2 providers, as well as to allow the parties to continue engaging in meaningful discussions.

3 For these reasons, and in order to avoid potentially unnecessary fees and costs if this  
4 matter settles, the parties hereby stipulate to continue the deadline to submit their Joint Pre-Trial  
5 Order an additional forty-five (45) days.

6 The deadline for filing the Joint Pre-Trial Order is hereby extended to August 3, 2018.

7 DATED this 19th day of June, 2018.

DATED this 19th day of June, 2018.

8 CHRISTIANSEN LAW OFFICES

PHILLIPS, SPALLAS & ANGSTADT, LLC

9 /s/ Keely A. Perdue, Esq.

/s/ Betsy C. Jefferis, Esq.

10 By \_\_\_\_\_

By \_\_\_\_\_

11 PETER S. CHRISTIANSEN, ESQ.

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14 *Attorneys for Plaintiffs*

Las Vegas, NV 89101

*Attorneys for Defendant Sam's West, Inc.*

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16  
17 **IT IS SO ORDERED.**

18 By  \_\_\_\_\_  
19 UNITED STATES MAGISTRATE JUDGE

20 Dated: June 21, 2018  
21 \_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedure 5 and the Court's Local Rules, the undersigned hereby certifies that on this 19th day of June 2018, a copy of the foregoing document entitled **STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR PARTIES TO FILE JOINTPRE-TRIAL ORDER (First Request)** was filed and served through the Court's electronic filing system (CM/ ECF) upon all registered parties and their counsel.

  
An employee of Christiansen Law Offices